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May 13, 2023

Via ECF

Hon. Arun Subramanian, United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse

Re: *Kaloshi et al v. West Village Oasis, Inc. et al.*, 22 CV 4593 (AS) (BCM)

Your Honor:

This firm represents the plaintiffs in the above-referenced action. The plaintiffs hereby move, with the defendants' consent, to extend the time to move to dismiss from today to May 28, 2024.

The parties have not yet finalized the settlement agreement, as a few issues remain to be resolved. The parties continue to work productively—plaintiffs provided revisions and comments May 2; defendants, May 9; plaintiffs, the same day; defendants, late last Friday; plaintiffs, early today. In correspondence today, defendants proposed, and plaintiffs agree, that the remaining issues are likely resolvable within one week. Defendants' counsel advises me that a seven-day revocation period must pass between execution and moving the Court to dismiss the action. The parties remain resolved that a settlement of this matter is more advantageous to the parties than continued litigation.

Prior to entry of the last order, I contacted defendants' counsel to schedule time to discuss the timeline for concluding the settlement with the purpose of seeking relief of the Court. Regrettably, the parties were unable to speak before the Court entered its order due to differing schedules that day. The delay was owing only to my good faith effort to communicate with opposing counsel prior to seeking relief from the Court, and I offer my sincere apology for the lack of timely communication to the Court.

I thank the Court for its time and consideration.

Application GRANTED. The Clerk of Court is directed to terminate the motion at ECF No. 106.

Respectfully submitted,
/s/
Brandon Sherr

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.
Date: May 14, 2024